

# **EXHIBIT B**

UNITED STATES DISTRICT COURT		SOUTHERN DISTRICT OF TEXAS	
PETER BARBARA and JOHN DREW, <i>versus</i> MCGRIFF INSURANCE SERVICES, INC.,		HOUSTON DIVISION CIVIL ACTION No. 4:22-CV-003340	
		<b>DEFENDANT'S WITNESS LIST</b>	
LIST OF: DEFENDANT TYPE OF HEARING: TRIAL		COUNSEL: GARY D. EISENSTAT AND JOHN M. BARCUS (OGLETREE DEAKINS)	
JUDGE: ANDREW S. HANEN	CLERK: RHONDA HAWKINS	REPORTER:	
No.	NAME OF WITNESS		
1.	<p>John Drew</p> <p>c/o opposing counsel</p> <p>Anticipated to testify regarding his claims and allegations in the lawsuit.</p>		
2.	<p>Patrick Dessauer</p> <p>Current McGriff employee; c/o undersigned counsel</p> <p>Anticipated to testify regarding his knowledge of the Program, McGriff's criteria for selecting producers to receive discretionary forgivable loans under the Program, his knowledge of why Drew was not selected to receive a forgivable loan in 2008 or thereafter (with the exception of 2016) and his communications with Drew and with other McGriff employees regarding the fact that McGriff did not select Drew to receive a forgivable loan under the Program.</p>		
3.	<p>Jennifer Vanloock</p> <p>Current McGriff employee; c/o undersigned counsel</p> <p>Anticipated to testify regarding McGriff's historical knowledge of the reason(s) Drew and certain other Producers were not selected to receive forgivable producer loans under the Program, and regarding Drew's compensation package with McGriff, including terms negotiated at the outset of employment as well as McGriff's practice, beginning in 2005, of giving Drew 100% credit (for salary purposes) of new business on accounts he originated, even where another Producer also serviced the account and received credit of their own.</p>		
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5.	<p>Bruce Dunbar</p> <p>3025 Cherokee Road Birmingham, AL 35223 (205) 969-0913</p> <p>Anticipated to testify regarding McGriff's implementation of the Program, including the criteria applied by McGriff in determining whether to issue discretionary forgivable loans to certain producers under the Program; and McGriff's reason(s) for electing not to issue discretionary forgivable loans to Drew and certain other producers.</p>
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Jay Aldis

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1300 Post Oak Blvd., Suite 2000  
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In the deposition of Doug Hodo, Mr. Aldis marked and introduced as an exhibit his notes of a call between himself and Mr. Hodo. To the extent Mr. Aldis intends to testify about that call, which may preclude him from appearing as counsel, McGriff will cross-examine him.

Respectfully submitted,

By: /s/ Gary D. Eisenstat

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Dallas, Texas 75225

(214) 987-3800

(214) 987-3927 (Facsimile)

**ATTORNEYS FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

I hereby certify that on December 27, 2023, the foregoing document was filed using the Court's electronic filing system, which will send notification of such filing to all counsel of record.

/s/ Gary D. Eisenstat

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